REMARKS/ARGUMENTS

Claim Rejection 35 U.S.C. §101

In response to the objection by the Examiner under 35 U.S.C. §101, independent claims 1 and 10 have been amended to incorporate the language "program tangibly embodied in a computer readable medium."

Claim Rejections 35 U.S.C. §103

Claim 1 has been amended by incorporating the limitations of claims 2 and 3 into claim 1 together with the statement that the user may select between a graphic tree and an outline-type view. This feature is described in the Summary of the Invention at page 3, line 30 through page 4, line 7 which notes that an object of the invention is to provide a tool that provides either tree or text outline representation of data and thus which allows the user to partake of the strength of each form.

While arguably Hugh and Marpe show, in different situations, what might be cast as text outlines or graphic tree diagrams, they are not presented as alter egos of the same data subject to the same adjustment of priorities as is now required by claim 1. Hugh does not appear to teach an outline display at all. The Examiner cites col. 30, lines 13-38 and Fig. 16 for support of the display of text identified ideas in text outline form. However, this section simply refers to a logical structure of data as stored on a computer file, for example, a disk or the like and is not a display to the user nor does Hugh say otherwise. While the logical structure of the files presented in Fig. 16 might arguably be called hierarchical, there is no teaching or connection in Hugh that they are arranged according to a numeric priority, but are simply a qualitative grouping as is evident from this text.

Marpe does not remedy this deficiency of Hugh. Arguably, Marpe teaches a trivial tree diagram having only a single branch (for example, as shown in Fig. 2) and a text outline, but one is not the alter ego of the other nor do they share the same numeric priorities that are adjustable.

Applicant generally disagrees with the Examiner's assertion that Hugh teaches arranging ideas in a graphic display according to numeric priorities noting

that the cited sections of <u>Hugh</u> do describe placing priorities on ideas, but only using them to filter when searching or creating lists not to display the fundamental hierarchical relationship dictated by the priority.

For the reasons described above, it is believed that claims 1, and 4 through 14 are now in condition for allowance and allowance is respectfully requested.

Although no additional fees are believed due for filing this amendment, if an additional fee is deemed to be due, please charge any fee to Deposit Account No. 17-0055.

Respectfully submitted,
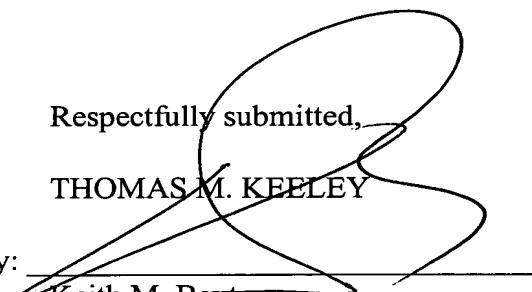
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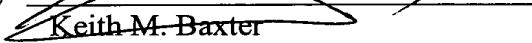
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